IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

J.B. INTERNATIONAL, LLC d/b/a	§	
J. BIRNBACH,	§	
	§	
Plaintiff,	§	
	§	
V.	§	Civil Action No. 3:22-cv-01422
	§	
WILLIAM NOBLE RARE JEWELS, L.P.,	§	
and WILLIAM NOBLE,	§	
	§	
Defendants.	8	

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Northern District of Texas Local Rules 7.1 and 56.4, Defendants William Noble Rare Jewels, L.P. ("WNRJ") and William Noble ("Noble") (collectively, the "Defendants") submit this *Response* (the "Response") to *Plaintiff's Motion for Summary Judgment* (the "Motion") (Dkts. #36-37). Pursuant to Northern District of Texas Local Rule 56.4(b), Defendants state that each of the matters required by Local Rule 56.4(a) will be set forth in Defendants' Brief in Opposition of Plaintiff's Motion for Summary Judgment, filed contemporaneously herewith and fully incorporated herein by reference (the "Brief").

For the reasons set forth in the Brief, Defendants respectfully request the Court deny Plaintiff's Motion as requested therein; and grant Defendants any and all other relief, special or general, at law or in equity, to which Defendants are justly entitled.

Dated: October 6, 2023 Respectfully Submitted,

CRAWFORD, WISHNEW & LANG PLLC

By: /s/ Trey Crawford

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on October 6, 2023, a true and correct copy of this document was served on all parties and counsel of record via e-file.

/s/ Trey Crawford

Trey Crawford